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Proposed Counsel for Shelley D. Krohn, Chapter 7 Trustee

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:

BECKETT G. CANTLEY,

Debtor.

Case No. BK-S-19-14235-ABL
Chapter 7

**STIPULATION TO: (1) EXTEND
DEADLINE TO OBJECT TO DEBTOR'S
DISCHARGE PURSUANT TO FEDERAL
RULE OF BANKRUPTCY PROCEDURE
4004; AND (2) EXTEND DEADLINE TO
OBJECT TO DEBTOR'S CLAIM OF
EXEMPTIONS PURSUANT TO
FEDERAL RULE OF BANKRUPTCY
PROCEDURE 4003**

Date of Hearing: N/A
Time of Hearing: N/A

Judge: Honorable August B. Landis¹

Shelley D. Krohn (the "Trustee"), the duly appointed Chapter 7 Trustee in the above-captioned bankruptcy case, by and through her proposed counsel of record, Jacob L. Houmand, Esq. of the Houmand Law Firm, Ltd., and Beckett G. Cantley (the "Debtor" and together with the Trustee, the "Parties"), by and through his counsel of record, H. Stan Johnson, Esq. of Cohen Johnson Parker Edwards, hereby stipulate and agree as follows:

...

...

¹ All references to "ECF No." are to the numbers assigned to the documents filed in the case as they appear on the docket maintained by the clerk of the court.

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I. RECITALS

1. On July 1, 2019, the Debtor filed a voluntary bankruptcy pursuant to Chapter 7 of Title 11 of the United States Code [ECF No. 1].

2. On July 1, 2019, the Trustee was appointed as the Chapter 7 Trustee in the Debtor's bankruptcy case [ECF No. 6].

3. On September 11, 2019, the Trustee concluded the Debtor's 341(a) Meeting of Creditors.

4. The current deadline to object to the Debtor's discharge is October 7, 2019.

5. The current deadline for the Trustee to file an objection to the exemptions claimed by the Debtor is October 11, 2019.

6. The Parties now seek to extend the deadline for the Trustee to object to the Debtor's discharge pursuant to 11 U.S.C. § 727 and Federal Rule of Bankruptcy Procedure 4004 and the deadline for the Trustee to object to the exemptions claimed by the Debtor.

II. STIPULATION

IT IS HEREBY STIPULATED AND AGREED that:

1. The Trustee shall have an extension of time to file any and all objections to Debtor's discharge under any and all provisions of 11 U.S.C. § 727; and

2. The Trustee shall have through and including **November 15, 2019**, to file a complaint objecting to the Debtor's discharge pursuant to any and all provisions of 11 U.S.C. § 727; and

3. The Trustee shall have an extension of time to file any and all objections to the exemptions claimed by the Debtor pursuant to Federal Rule of Bankruptcy Procedure 4003(b); and

4. The Trustee shall have up to and including **November 15, 2019**, to file any objections to the exemptions claimed by the Debtor pursuant to Federal Rule of Bankruptcy Procedure 4003; and

...

...

1 5. This Stipulation is without prejudice to any of the Parties requesting a further
2 extension of time from the Court for cause shown.

3 Dated this 7th day of October, 2019.

Dated this 7th day of October, 2019.

4 By: /s/ Jacob L. Houmand
5 Jacob L. Houmand, Esq. (NV Bar No. 12781)
6 Houmand Law Firm, Ltd.
9205 West Russell Road, Building 3, Suite 240
Las Vegas, NV 89148

By: /s/ H. Stan Johnson
H. Stan Johnson, Esq. (NV Bar No. 0265)
Cohen Johnson Parker Edwards
375 E. Warm Springs Road, Suite 100
Las Vegas, NV 89119

7 *Proposed Counsel for Shelley D. Krohn,*
8 *Chapter 7 Trustee*

Counsel for the Debtor